

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA,

Plaintiff,

-vs.-

**NOTICE OF MOTION AND
MOTION TO TRANSFER
VENUE**

6:17-cv-06670-EAW

OCEAN REEF CHARTERS LLC and
STONEGATE BANK,

Defendants.

PLEASE TAKE NOTICE that, upon the Affirmation of Karl S. Essler, dated December 14, 2017 and the Declaration of Richard Gollel dated December 14, 2017, the Defendant, OCEAN REEF CHARTERS LLC, will move this Court at a Motion Term thereof, to be held at the United States Courthouse, 100 State Street, Rochester, New York 14614, on the ____ day of _____, 201__m at _____ __.m., for an Order, pursuant to 28 U.S.C. §1404(a) and Rule 12(b)(3) of the Federal Rules of Civil Procedure, to transfer venue of this action to the Southern District of Florida, together with such other and further relief as to the Court may seem just and proper; and

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule of Civil Procedure 7(b)(2)(B), if the Court does not set a scheduling order for the submission of papers on this motion, opposing party shall have fourteen (14) days after service of the motion to file and serve responding papers, and the moving party shall have seven (7) days after service of the responding papers to file and serve reply papers.

Oral argument is requested. Moving Defendant intends to serve reply papers.

December 15, 2017

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